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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION**

**GREATER HELLS CANYON  
COUNCIL; OREGON WILD; CENTRAL  
OREGON LANDWATCH; SIERRA  
CLUB; GREAT OLD BROADS FOR  
WILDERNESS; and WILDEARTH  
GUARDIANS,**

Plaintiffs,

v.

**HOMER WILKES; GLENN  
CASAMASSA; and the UNITED STATES  
FOREST SERVICE,**

Defendants,

**AMERICAN FOREST RESOURCE  
COUNCIL; EASTERN OREGON  
COUNTIES ASSOCIATION,**

Case No. 2:22-CV-00859-HL

**PLAINTIFFS' AND DEFENDANTS'  
JOINT MOTION TO EXTEND AND SET  
DEADLINES**

In accordance with Local Rule 16-3, Plaintiffs and Defendants respectfully request a short extension of time (of two or three weeks, depending on the particular deadline) on the summary judgment briefing due dates the Court set after the Parties' October 11, 2022, Scheduling Conference, and propose briefing and other litigation deadlines regarding Administrative Record ("AR") motions, if any. *See* ECF No. 26. The current deadlines, and the deadlines that Plaintiffs and Defendants now propose, are identified below in a table. Intervenor-Defendants do not oppose this Motion, and Plaintiffs and Defendants have good cause for the Court to grant this request.

<b>Item</b>	<b>Current Schedule</b>	<b>Proposed</b>
Ongoing conferral	No Deadline Set	Through 11/30/22
Defendants notify Plaintiffs of final agreed-upon list of items to be included in AR	No Deadline Set	12/2/22
Defendants file revised AR	11/23/22	12/9/22
<b>Motions practice over AR (if needed)</b> If Plaintiffs so move, summary judgment briefing schedule will be suspended. Parties will submit a proposed briefing schedule within 7 days of the Court's order on the motion to complete/supplement the AR.		
Plaintiffs' Motion	No Deadline Set	12/12/22
Defendants' Response	No Deadline Set	1/9/23
Plaintiffs' Reply	No Deadline Set	1/27/23
<b>Summary Judgment</b> If no Motion to Complete/Supplement		
Plaintiffs' Motion	12/12/22	12/23/22
Defendants' Cross-Motion	1/20/23	2/3/23
Intervenors' Cross-Motion	1/27/23	2/10/23
Plaintiffs' Response/Reply	2/24/23	3/15/23
Defendants' Reply	3/13/23	4/7/23
Intervenors' Reply	3/20/23	4/14/23
Oral Argument	4/12/23	Week of 4/24/23, if possible

The Parties are currently conferring on the contents of the AR, as contemplated in the October 11, 2022, status conference. However, this conferral process involves the potential addition of thousands of pages of content to the AR, and analysis of multiple legal issues. Thus, the conferral process has, and is, requiring substantial time and input from agency personnel, as well as attorney time. Accordingly, Plaintiffs and Defendants move the Court to adopt the above schedule to allow for a full conferral process. Although the requested extensions have the potential to delay resolution of this matter by approximately two weeks, it is also possible that the extensions will expedite final resolution of the case by eliminating the need for an AR motion post-conferral (which, if filed, would stay the summary judgment briefing schedule if the Court orders the procedure that Plaintiffs and Defendants propose above).

Because the above schedule provides for the efficient resolution of this lawsuit and good cause exists, the Plaintiffs and Defendants respectfully request that the Court adopt the above proposed schedule as an Order of the Court.

Respectfully submitted this 18th day of November, 2022.

s/ Meriel L. Darzen (with permission)

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